

HEATHER E. WILLIAMS, #122664  
Federal Defender  
RACHELLE BARBOUR, #185395  
Assistant Federal Defender  
OFFICE OF THE FEDERAL DEFENDER  
801 I Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
Tel: 916-498-5700/Fax: 916-498-5710

Attorney for Defendant  
XAVIER ROBERTS

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No: 2:24-CR-0309-WBS
	)	
Plaintiff,	)	
	)	STIPULATION AND ORDER TO CONTINUE
vs.	)	STATUS CONFERENCE AND EXCLUDE
	)	TIME
XAVIER ROBERTS,	)	
	)	District Judge William B. Shubb
Defendant.	)	New Date: October 27, 2025
	)	Time: 10:00 a.m.
	)	

IT IS HEREBY STIPULATED and requested by and between the parties through their respective counsel, HEIKO COPPOLA, Assistant United States Attorney, attorney for the UNITED STATES, and RACHELLE BARBOUR, attorney for Defendant XAVIER ROBERTS, that the status conference currently set for Monday, September 8, 2025, be continued to Monday, **October 27, 2025, at 10:00 a.m.**, and that time be excluded for preparation of counsel.

The Government has provided hundreds of documents and dozens of video files for Defense counsel's review in this case. Since the start of the case, Defense counsel has been reviewing and analyzing the above, conducting legal research, meeting with her client, and otherwise preparing for trial. The above tasks are ongoing, and the defense requires additional time to review discovery, discuss the case with her client and the Government, conduct further research in support of a plea resolution, and continue to prepare.

The parties expect to finalize a plea agreement in the additional time requested and provide it to the Court for its review in anticipation of a change of plea at the next hearing. The

1 parties believe that failure to grant the requested continuance would deny defense counsel the  
2 reasonable time necessary for effective preparation, taking into account the exercise of due  
3 diligence.

4 Accordingly, the parties stipulate and request that the Court exclude time between the  
5 date of the filing of this stipulation through the new status conference date of October 27, 2025,  
6 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of  
7 justice served by continuing the case as requested outweigh the interest of the public and the  
8 defendant in a trial within the original date prescribed by the Speedy Trial Act.

9 Date: September 2, 2025

10  
11 HEATHER E. WILLIAMS  
Federal Defender

12 /s/ Rachelle Barbour  
13 RACHELLE BARBOUR  
14 Attorney for Defendant  
XAVIER ROBERTS

15  
16 Date: September 2, 2025


ERIC GRANT  
United States Attorney

17 /s/ Heiko Coppola  
18 HEIKO COPPOLA  
19 Assistant U.S. Attorney  
Attorney for the United States

20  
21 O R D E R

22  
23 The Court, having received and considered the parties' stipulation, and good cause  
24 appearing therefrom, adopts the parties' stipulation in its entirety as its order.

25 Dated: September 2, 2025

26   
27 WILLIAM B. SHUBB  
28 UNITED STATES DISTRICT JUDGE